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19 A JEWISH VOICE FOR PEACE

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24 **UNITED STATES DISTRICT COURT**
25 **FOR THE DISTRICT OF MASSACHUSETTS**

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27 PRESIDENT AND FELLOWS OF HARVARD
28 COLLEGE,

1 Plaintiffs,

2 v.

3 UNITED STATES DEPARTMENT OF
4 HEALTH AND HUMAN SERVICES, et al.,

5 Defendants.

6 Case No.: 1:25-cv-11048-ADB

7 [Assigned to the Honorable Judge Burroughs]

8 **BRIEF OF AMICUS CURIAE ON BEHALF**
9 **OF A JEWISH VOICE FOR PEACE**

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15 **INTRODUCTION**

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17 **I. Amicus JVP**

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19 Amicus curiae A Jewish Voice for Peace, Inc. (“JVP”) appears in this case to address two
20 issues: (1) Defendants’ position that criticism of Israel or Zionism is antisemitic, and (2) that Plaintiffs
21 must remediate antizionism by adopting the International Holocaust Remembrance Alliance’s
22 (“IHRA”) equivalence of antizionism and antisemitism. JVP is one of the largest progressive Jewish
23

1 organizations in the world. JVP has worked for over 25 years to mobilize Jewish communities to
2 advocate for a just society in Palestine and Israel rooted in human rights rather than oppression,
3 “equality rather than supremacy, dignity rather than domination, democracy rather than dispossession.
4 A society where every life is precious.”¹ Made up of 720,000 members and supporters with chapters
5 in nearly every state, JVP represents an important, sizeable and vocal minority Jewish viewpoint.
6 Studies show a fifth to a third of American Jews share JVP’s viewpoint,² and 45% of Jewish students
7 believe Israel should not be a Jewish state or are undecided on the issue.³ Accordingly, JVP has a
8 unique perspective and specific experience that can assist the Court beyond what the parties can
9 provide.⁴ Amicus seeks to appear in support of Plaintiffs’ Motion for Summary Judgment (“MSJ”),
10 and writes to situate Plaintiffs’ lawsuit in the broader context of the longstanding disagreements within
11 the Jewish faith regarding Zionism and Israel.

12 **II. Amicus’s interest in this case**

13 As antizionist Jews who criticize Israel’s policies, JVP believes “that [their] voices are needed
14 because the Zionist movement and the state of Israel purport to speak for and act on behalf of all
15 Jews.”⁵ But “as Jews, [JVP] do[es] not believe that to be Jewish you must support Zionism.”⁶ JVP has
16 grave concerns that the Court will accept Defendants’ position that criticizing Israel and opposing
17 Zionism are antisemitic. Doc. 59-1 Ex. A at 4-5, Ex. E at 3, Ex. F at 2, Ex. G at 2, Ex. H at 2, Ex. I at
18 2, Ex. K at 2, Ex. M at 2, Ex. N at 2 (also citing Executive Order 14188 Additional Measures to
19 Combat Anti-Semitism, Jan. 29, 2025), Ex. P at 2-3. JVP is further concerned the Court will find that
20 antizionism should properly be remediated by adopting the IHRA’s newly manufactured definition of
21 antisemitism to include antizionism or criticizing Israel. Doc. 59 ¶¶ 61, 62. Should this Court accept

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23 ¹ A Jewish Voice for Peace, *Our Vision*, available at <https://tinyurl.com/cemw6eb9>.

24 ² Decl. of Stefanie Fox ¶ 3; Jewish Electorate Institute, *November 2023 National Survey of Jewish*
25 *Voters*, Nov. 18, 2023, available at <https://tinyurl.com/cue2bp3e>; Jerusalem Center for Security and
Foreign Affairs, *Survey Among American Jews: Over 51% Support for Biden’s Decision to Withhold*
Arms Shipments to Israel, May 31, 2024, available at <https://tinyurl.com/2e4kdavk>.

26 ³ Eitan Hersh & Dahlia Lyss, Report to the Jim Joseph Foundation, *A Year of Campus Conflict and*
Growth: An Over-Time Study of the Impact of the Israel-Hamas War on U.S. College Students, Sept.
27 2024, available at <https://tinyurl.com/mmxmjb8x>.

28 ⁴ Decl. of Stefanie Fox.

⁵ *Id.* at ¶ 4.

⁶ *Id.* at ¶ 11.

1 Defendants' position that adopting the IHRA's redefinition effectively addresses antisemitism and that
2 antisemitism includes antizionism, the Court would be redefining the Jewish faith. This ruling would
3 force Jews to adopt a political ideology—Zionism—as part of their religious beliefs, and enshrine "do
4 not criticize the nation-state of Israel" as a foundational religious belief in Judaism. In other words,
5 this Court would be dictating who is and is not a Jew, what Jews are required to believe, and that
6 criticism of a political ideology and nation-state is as heinous as hatred towards a religious group.
7 Such a finding would render antizionist Jews as not being Jews at all and would dilute the protected
8 classes that decades of precedent and lawmaking have defined.

9 Defendants have already forced the IHRA redefinition into many university policies. Plaintiffs
10 made policy changes "to take account of the [] IHRA's definition of antisemitism in its antiharassment
11 policies and disciplinary proceedings."⁷ Doc. 59 ¶ 61. Conforming to the IHRA's redefinition,
12 Plaintiffs made these changes because "for many Jewish people, Zionism is a part of their Jewish
13 identity." *Id.* at ¶ 62, fns. 26, 27 (cite to "Harvard University Office for Community Conduct
14 Frequently Asked Questions"). Adopting the IHRA makes "clear that the Non-Discrimination policy
15 applies to conduct targeting Zionists." *Id.* at ¶ 62. In the past six months alone, Harvard has cancelled
16 an antizionist Jewish Passover Seder,⁸ suspended their Religion, Conflict, and Peace Program and
17 demoted the directors,⁹ let go of the heads of the Center for Middle East Studies,¹⁰ suspended their
18 research partnership with Birzeit University in the West Bank,¹¹ fired a librarian for taking down an
19 Israeli hostage poster,¹² and cancelled a medical school panel featuring patients from Gaza.¹³ But

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7 Dhruv T. Patel and Grace E. Yoon, *One Day After Trump Takes Office, Harvard Settles Two*
21 *Antisemitism Lawsuits*, The Harvard Crimson, Jan. 21, 2025, available at <https://tinyurl.com/5n8b6uty>.

22
8 Samuel A. Church and Cam N. Srivastava, *Adams House Withdraws Support for Anti-Zionist*
Passover Event, Citing Policy on Unrecognized Student Groups, The Harvard Crimson, Apr. 14, 2024,
23 available at <https://tinyurl.com/4t9xzrbr>.

24
9 Sebastian B. Connolly and Julia A. Karabolli, *Harvard Divinity School Suspends Religion, Conflict,*
and Peace Initiative, The Harvard Crimson, Apr. 2, 2025, available at <https://tinyurl.com/2burph4v>.

25
10 Haley Cohen, *Harvard Cleans House at Middle Eastern Studies Department*, The Crimson, Mar. 30,
2025, available at <https://tinyurl.com/2dfyhp7n>.

26
11 Dhruv T. Patel and Grace E. Yoon, *Harvard Suspends Research Partnership with Birzeit University*
in the West Bank, The Harvard Crimson, Mar. 27, 2025, available at <https://tinyurl.com/3bvfjfx6n>.

27
12 Dion J. Pierre, *Harvard Fires Librarian for Tearing Down Israeli Hostage Poster*, The Algemeiner,
Mar. 12, 2025, available at <https://tinyurl.com/4d2mrkk5>.

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13 Rachel Fink, *Harvard Med School Cancels Panel Featuring Gazans Treated in U.S., Citing One-*
Sidedness, Haaretz, Jan. 26, 2025, available at <https://tinyurl.com/2r9khb76>.

1 discriminating against one type of Jew in favor of another, here Zionist Jews over antizionist Jews,
2 restricts Jews from practicing their religious beliefs by adopting a narrow view of what it means to be
3 Jewish. It ignores facts and decades of history, and severely limits JVP members, supporters and
4 anyone holding similar views from exercising their constitutional rights. JVP members are Harvard
5 students and professors who oppose Israel's treatment of Palestinians in Gaza and who would be
6 directly impacted should the Court adopt this reasoning in its potential ruling.

7

8 **ARGUMENT**

9 **III. The Original Purpose of the First Amendment and Establishment Clause Sought to**
10 **Prevent This Very Type of Government Interference with Religion: Telling Jews How to**
Worship and Favoring One Type of Jew Over Another.

11 Should this Court find that antizionism or criticizing Israel is antisemitic and that adopting the
12 IHRA definition in one's policies remediates this, the Court would be redefining what it is to be a Jew.
13 The Court would be ruling that any actions opposing Zionism or criticizing Israel, including by Jews
14 in JVP, are antisemitic. *Id.* Such a ruling would mean that Zionism and supporting Israel are required
15 parts of the Jewish faith. But this Court dictating what constitutes valid or required Jewish beliefs runs
16 directly counter to the Establishment Clause of the First Amendment, its history, and its purpose.

17 The First Amendment was adopted to ensure “that neither the power nor the prestige of the
18 Federal Government would be used to control, support or influence” the kinds of worship Americans
19 practice. *Engel v. Vitale*, 370 U.S. 421, 430-431 (1962). It guards against “the pressures of government
20 for change each time a new political administration is elected to office.” *Id.*

21 In distinguishing between permissible and impermissible acts under the Establishment Clause,
22 courts must be consistent “with history and faithfully reflec[t] the understanding of the Founding
23 Fathers.” *Kennedy v. Bremerton Sch. Dist.*, 597 U.S. 507, 535-536 (2022) (citation omitted). The
24 original purpose of the Establishment Clause “rested upon awareness of the historical fact that
25 governmentally established religions and religious persecutions go hand in hand.” *Id.* at 432. “[T]he
26 First Amendment. . . . was written to quiet well-justified fears” when past governments had forced
27 people to “speak only the religious thoughts that government wanted them to speak.” *Id.* at 435. Its
28 purpose was to “protect the integrity of individual conscience in religious matters” and “guard against

1 the civic divisiveness that follows when the government weighs in on one side of religious debate.”
2 *McCreary Cnty., Ky. v. ACLU of Ky.*, 545 U.S. 844, 876 (2005). James Madison, the primary author of
3 the First Amendment, warned over 200 years ago: “Who does not see that the same authority which
4 can establish Christianity, in exclusion of all other Religions, may establish with the same ease any
5 particular sect of Christians, in exclusion of all other Sects? . . . [and] may force him to conform.”
6 *Engel*, 370 U.S. at 436; Memorial and Remonstrance Against Religious Assessments, James Madison,
7 1875, available at <https://tinyurl.com/msbnc9r>.

8 Courts violate the Establishment Clause when they involve themselves in internal religious
9 affairs, or discriminate against minority faiths. Courts must remain neutral. For instance, the
10 Establishment Clause “bar[s] the government from interfering with the decision of a religious group”
11 to reject or fire a fellow religious community member. *Hosanna-Tabor Evangelical Lutheran Church*
12 & Sch. v. E.E.O.C., 565 U.S. 171, 181 (2012). Courts also violate the Establishment Clause when they
13 discriminate based on “an aversion or bias. . . against minority faiths.” *Town of Greece v. Galloway*,
14 572 U.S. 565, 585-86 (2014). Adhering to the Establishment Clause therefore “demands religious
15 neutrality—government may not exercise a preference for one religious faith over another.” *Van*
16 *Orden v. Perry*, 545 U.S. 677, 709 (2005). To remain neutral, the government should not favor “the
17 religious practices and beliefs of some citizens” as it sends a message “to nonadherents that they are
18 outsiders or less than full members of the political community.” *Santa Fe Indep. Sch. Dist. v. Doe*, 530
19 U.S. 290, 309-310 (2000), citing *Lynch v. Donnelly*, 465 U.S. 668, 688 (1984) (conc. Opn. Of
20 O’Connor, J.). This is why the Establishment Clause was originally designed to prevent the
21 government “from appearing to take a position on questions of religious belief.” *County of Allegheny*
22 v. *ACLU*, 492 U.S. 573, 594 (1989), citing *Lynch*, 465 U.S. at 687 (conc. Opn. Of O’Connor, J.).

23 Should this Court accept Defendants’ position that opposing Zionism or criticizing Israel are
24 per se antisemitic, and that Plaintiffs adopting the IHRA in response ameliorates the issue, the Court
25 would “interfere[e] with the decision of a religious group” and internal Jewish religious affairs.
26 *Hosanna-Tabor Evangelical Lutheran Church*, 565 U.S. at 181. This Court would, in essence, declare
27 that opposing Zionism or criticizing Israel is per se antisemitic and that Jews are required to believe in
28 these political ideas. This would be a “blatant exercise [of] a preference for one religious faith over

1 another,” *Van Orden*, 545 U.S. 677, based on “an aversion or bias. . . against [this] minority faith[].”
2 *Town of Greece*, 572 U.S. at 585-86. Such an exercise would use the federal government’s “power”
3 and “prestige” “to control, support or influence” the kinds of worship and beliefs Jews hold. *Engel*,
4 370 U.S. at 430-431. The result would “exclu[de] [] all other [Jewish] Sects”—here, antizionist Jews
5 who do not pledge loyalty to another nation state (Israel)—and essentially expel JVP and other
6 antizionist Jews, a minority group, from Judaism. *Id.* Yet Defendants’ position does not represent the
7 views of all Jews and certainly not the views of JVP, and in fact runs directly counter to them.

8 Defendants’ definition, and the Court accepting it, would label JVP Jews who oppose Zionism
9 or criticize Israel as antisemitic. This position ignores Jewish students and faculty at Harvard who
10 view the IHRA definition as “intellectually vacuous” that “muddles what speech is considered
11 immoral.”¹⁴ It “punish[es] reasonable and valid criticism of Israel, including that which Jewish
12 students initiate” as antisemitic.¹⁵ It ignores Jewish Harvard faculty who oppose Harvard Hillel’s¹⁶
13 “longstanding hostility to dissent despite [the Jewish] community’s persistent disagreements on Israel,
14 Palestine, [and] Zionism.”¹⁷ By “framing [antizionist Jews’] critiques as antisemitic,” Defendants’
15 position “is a direct attack on [their] Jewish identity and heritage.”¹⁸ Defendants’ position fails to take
16 into account Israeli Professors who oppose the IHRA’s definition of antisemitism as “conflat[ing]
17 criticism of Israeli policies with antisemitism itself.”¹⁹ It ignores the former Hillel Director of 18 years
18 when he states “it is not antisemitic to demand justice for all Palestinians living in their ancestral
19 lands.”²⁰ It even ignores opposition to adopting the IHRA as policy from Kenneth Stern, the lead
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21 ¹⁴ Charlotte P. Ritz-Jack, *I Am a Jewish Student. Harvard’s Settlement is Bad News*, The Harvard
22 Crimson, Jan. 23, 2025, available at <https://tinyurl.com/yu76peum>.

23 ¹⁵ *Id.*

24 ¹⁶ Hillel is an organization active on college campuses to in part facilitate Jewish students’ connections
25 to Israel. See “What does Hillel Offer Students?” section of Hillel’s website regarding the Birthright
26 Israel trips, <https://www.hillel.org/hillel-faqs/>.

27 ¹⁷ Aaron D.A. Shakow, *I’m a Jewish Faculty Member at Harvard. Hillel Does Not Represent Me*, The
28 Harvard Crimson, Oct. 23, 2024, available at <https://tinyurl.com/2sbt2cfn>.

¹⁸ Shakow, *supra* note 9.

¹⁹ Atalia Omer, *I’m an Israeli Professor. Why is My Work in Harvard’s Antisemitism Report?*, The
Guardian, May 9, 2025, available at <https://tinyurl.com/w85zra9t>.

²⁰ Bernie Steinberg, *For the Safety of Jews and Palestinians, Stop Weaponizing Antisemitism*, The
Harvard Crimson, Dec. 29, 2023, available at <https://tinyurl.com/ybxv4tsj>.

1 drafter of the IHRA itself.²¹ This “cynical weaponization of antisemitism by powerful forces” is
2 intimidation that “ultimately silence[s] legitimate criticism of Israel and of American policy on
3 Israel.”²² As this former Hillel director argues, similar to JVP, Jews must “be boldly critical of
4 Israel—not despite being Jewish, but because [they] are.”²³

5 These Harvard student and faculty views represent the larger “shifting opinion on
6 Israel/Palestine” among American Jews, including those of JVP.²⁴ A 2021 Jewish Electorate poll
7 showed Jewish voters believed “intense criticism of Israel is generally not seen as antisemitic.”²⁵
8 Thirty-one percent of Jewish voters felt Israel is committing genocide against Palestinians *in 2021*,
9 long before October 7, 2023.²⁶ Jewish organization J Street’s 2024 National Jewish Voters Survey
10 found that 71% of Jewish voters do not “believe that criticism of how Israel is conducting the war in
11 Gaza is antisemitic.”²⁷ Defendants ignore that Judaism is a millennia old religion by claiming that this
12 ancient religion requires complete and uncompromising loyalty to Israel,²⁸ a nation-state just 77 years
13 old. Defendants cannot deny the existence of a significant number of Jews in JVP and throughout the
14 world opposing Israel’s policies who do not view their Jewish faith as requiring support for Israel or
15 Zionism. In fact, many Jews believe the opposite: that their faith compels them to *oppose* Israel’s
16 policies and Zionism. Defendants’ position and the IHRA redefinition impermissibly force this court
17 to “take a position on [these] questions of religious belief” in violation of the Establishment Clause.
18 *County of Allegheny*, 492 U.S. at 594.

19 This Court taking such a position would also violate the “integrity of individual conscience in
20 religious matters” and enable “civic divisiveness” by “weigh[ing] in on one side of [this] religious

21 United States Senate Judiciary Committee, Written Testimony of Kenneth S. Stern, Director, Bard
22 Center for the Study of Hate, *A Threat to Justice Everywhere: Stemming the Tide of Hate Crimes in*
23 *America*, Sept. 17, 2024, available at <https://tinyurl.com/zawfmm2y>.

22 *Id.*

23 *Id.*

24 Caroline Morganti, *Recent Polls of US Jews Reflect Polarized Community: Trying to Keep Up with*
25 *Shifting Opinion on Israel/Palestine, Surveys of American Jews are Beginning to Ask Questions*,
26 Jewish Currents, June 29, 2023, available at <https://tinyurl.com/4hcu5dn9>.

25 Jewish Electorate Institute: National Survey of Jewish Voters, July 2021, at 5, 36, available at
26 <https://tinyurl.com/yjrac6fw>.

26 *Id.*

27 J Street, 2024 National Jewish Voters Survey, available at <https://tinyurl.com/4ejfpbps>.

28 Decl. of Stefanie Fox ¶ 10

1 debate.” *McCreary Cnty., Ky.*, 545 U.S. at 876. The Court would be endorsing “the religious practices
2 and beliefs of [Zionist Jews]” while sending a message to the “nonadherent[]” antizionist Jews who
3 oppose Israel’s policies “that they are outsiders or less than full members of the political community.”
4 *Santa Fe Indep. Sch. Dist.*, 530 U.S. at 309-310. This would “force [Jews like those in JVP] to
5 conform” their beliefs to those of Zionist Jews’ beliefs. *Engel*, 370 U.S. at 436; Memorial and
6 Remonstrance Against Religious Assessments, James Madison, 1875. This type of government
7 interference defining which are and are not valid religious beliefs is exactly what the Founding Fathers
8 and drafters of the First Amendment and the Establishment Clause sought to prevent.

9 A court ruling accepting Defendants’ position and finding the IHRA’s redefinition of
10 antisemitism properly addresses the issue would result in three religious-based constitutional
11 violations: (1) it would define antisemitism as criticizing Israel’s policies and acts in Gaza and the
12 West Bank and opposing Zionism; as a result, it would (2) codify that supporting Israel and Zionism
13 are tenets of Judaism, or requirements to be a Jew; and by finding as such, it would (3) label Jews who
14 criticize Israel’s policies and Zionism as *not* Jewish and, worse, as inherently antisemitic. If the Court
15 were to base its ruling on such an argument, it would “make [antizionist Jews opposing the Israeli
16 government’s policies] speak only the religious thoughts that government wanted them to speak” to
17 still be considered valid Jews. *Engel*, 370 U.S. at 435. All of these arguments are incompatible with
18 the First Amendment and the Free Exercise Clause. Amicus is not asking this Court to find that
19 Zionists Jews’ beliefs are *not* Judaism, but rather asking the Court to refrain from “weigh[ing] in on
20 one side of [this] religious debate” to define what is and is not Judaism. *McCreary Cnty., Ky.*, 545 U.S.
21 at 876.

22 **IV. In Addition to the Constitution, International Law Guarantees JVP’s Religious Freedom**

23 JVP believes Judaism embraces the principles of humanity, justice, peace and equality.
24 International law enshrines JVP’s right to their religious beliefs free of government intrusion through
25 several instruments, such as the International Covenant on Civil and Political Rights (“ICCPR”)
26 Articles 18 and 27, which guarantee religious freedom and the rights of religious minorities.²⁹ Indeed,
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28 ²⁹ ICCPR, U.N. General Assembly Treaty Series, vol. 999, Dec. 1966,
Art. 27, 18, available at <https://tinyurl.com/37hph8wp>.

1 JVP's Jewish religious community helped build international law into what it is today. JVP's faith
2 compels upholding international human rights, and JVP asks this Court not to interfere with or
3 contravene international law.

4 Similar to the history and origins of the First Amendment and Establishment Clause, religious
5 organizations played a key role in launching and sustaining the human rights movement including
6 paving the way for the Universal Declaration of Human Rights ("UDHR"). So much so that "the U.N.
7 Human Rights Office in 2017 launched an initiative called 'Faith for Rights'" encouraging religious
8 leaders to build peaceful societies upholding human dignity and equality, and embrace diversity.³⁰ It is
9 the Jewish community's suffering and persecution in the Nazi Holocaust that led to the enactment of
10 the Genocide Convention in 1948.³¹ Compelled by this history, many Jews including JVP believe it is
11 their duty to uphold the very principles their community helped enact. The Genocide Convention
12 prohibits targeting specific groups for their national, ethnic, racial or religious affiliation, deliberately
13 inflicting living conditions to destroy this group, and forcibly transferring this group, as well as
14 conspiring to commit and complicity in these acts.³² The Genocide Convention built the foundation of
15 numerous international human rights and humanitarian laws and principles celebrated today, such as
16 the Fourth Geneva Conventions mandating occupying powers protect civilians and ensure their care
17 and survival, the Convention on the Elimination of All Forms of Racial Discrimination ("ICERD"),
18 and the Convention on the Suppression and Punishment of the Crime of Apartheid.³³

19 ³⁰ Press Release, "Universal Declaration of Human Rights at 70: 30 Articles on 30 Articles-Article
20 18," Office of the High Commissioner for Human Rights, Nov. 27, 2018, available at
<https://tinyurl.com/5bca6s3x>.

21 ³¹ Convention on the Prevention and Punishment of the Crime of Genocide ("Genocide Convention"),
22 General Assembly Resolution 260 A (III), Dec. 9, 1948, entry into force Jan. 12, 1951, available at
<https://tinyurl.com/swuvvmz96>.

23 ³² Genocide Convention, Art. 2, 3.

24 ³³ The 1949 Geneva Convention Relative to the Protection of Civilian Persons in Time of War (Fourth
25 Geneva Convention), Aug. 12 1949, 75 UNTS 287, Art. 14, 16, 18, 20, 23 (requiring occupying
26 powers safeguard hospitals, access to hospitals and safety of sick and injured people), Art. 24, 50
27 (requiring occupying powers protect and ensure the safety of children), Art. 49 (prohibiting occupying
28 powers from forcibly transferring and deporting protected persons from occupied territory), Art. 55
powers from forcibly transferring and deporting protected persons from occupied territory), Art. 55
(mandating the occupying power ensure food and medicine to the occupied population), Art. 32, 33
(prohibiting torture and collective punishment by any nation state); 1966 International Convention on
the Elimination of All Forms of Racial Discrimination, Treaty Series, 660, 195, (prohibiting racial
discrimination, racial segregation and apartheid), available at <https://tinyurl.com/fjzy2c59>); The 1976
International Convention on the Suppression and Punishment of the Crime of Apartheid, U.N. Doc.

1 Building from “generations . . . before [them, JVP] fight[s] for the liberation of all
2 people.”³⁴ JVP’s religious beliefs compel them to uphold the Genocide Convention’s principles not
3 only prohibiting genocide but also complicity in it. Based on their beliefs, JVP opposes Israel’s
4 policies in Gaza and the West Bank which violate international human rights and humanitarian law.
5 JVP follows the Genocide Convention’s mandate and upholds the rule of law, including the
6 International Court of Justice’s (“ICJ”) January 26, 2024 ruling ordering Israel to abide by its
7 obligations under the Genocide Convention.³⁵

8 **CONCLUSION**

9 JVP beseeches this Court to not declare that Jews opposing Zionism or the Israeli
10 government’s policies are antisemitic and thus discriminatory towards themselves and their own
11 people. JVP are following their Jewish faith and the Genocide Convention’s mandate by opposing
12 Israel’s policies in Gaza and the West Bank, and Zionism. JVP requests this Court grant Plaintiffs’
13 motion and reject Defendants’ attempt to redefine antisemitism as criticism of Israel or Zionism.

14 Dated: June 9, 2025

15 Respectfully Submitted,
16 Attorneys for Jewish Voice for Peace

17 HADSELL STORMER RENICK & DAI LLP

18 /s/ Bina Ahmad

19 Bina Ahmad*
20 Dan Stormer
Hanna Chandoo

21 **Pro Hac Vice Admission Pending*

22 

23 _____
24 Rachel Weber

25 A/9030, available at <https://tinyurl.com/yc7kfj9x>.

26 ³⁴ Jewish Voice for Peace, *Our Vision*, available at <https://tinyurl.com/cemw6eb9>.

27 ³⁵ ICJ Order of Jan. 26, 2024, Doc. No. 192-20240126-ORD-01-00-EN, Case 192-Application of the
Convention on the Prevention and Punishment of the Crime of Genocide in the Gaza Strip (South
Africa v. Israel), available at <https://www.icj-cij.org/node/203447>; ICJ Press Release on modification
of the Order of Mar. 28 2024 – Application of the Convention on the Prevention and Punishment of
the Crime of Genocide in the Gaza Strip (South Africa v. Israel).